

Client File Documentation and Reporting Requirements Update

ODOC Weatherization Program Notice 23-4

Issued June 30, 2023

To: All ODOC Subgrantee Regional Weatherization Service Providers, CAA Executive Directors, CAA Chief Financial Officers, and Regional Weatherization Program Service Area Managers

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Regulations: [10 CFR 440.24 – Recording Keeping](#), [10 CFR 440.25 – Reports](#), [ODOC Weatherization Manual](#), [DOE Weatherization Program Notice 10-08](#)

Purpose: To provide an update to Regional Weatherization Service Providers regarding the use of Weatherization Assistance Program for DHS LIHEAP, DOE WAP, and DOE BIL funds concerning operation procedures relevant to the Oklahoma Weatherization Assistance Programs. Specifically, WPN 23-2 provides new requirements for client file documentation and reporting for DHS LIHEAP, DOE WAP, and DOE BIL.

Implementation Date: Effective July 1, 2023, and retroactively effective for all reports due since October 1, 2022 (for WAPBIL). This guidance will remain in effect until further ODOC notice.

This Program Notice supplements the current ODOC Manual Sections 12, 13, and 41. Should anything in this Program Notice conflict with any Weatherization Program Operations Manual Requirement, this Program Notice will supersede and take precedence.

Regulatory Background

ODOC and Subgrantees of the Weatherization Assistance Program (DHSLIHEAP/DOEWAP/DOEBIL) have a shared responsibility and obligation to make every effort possible to ensure that all qualified Oklahoma residents are provided equal opportunity to apply for the Weatherization programs and that application information stays organized and auditable. Weatherization programs are required to implement weatherization under strict guidelines/procedures to ensure safe and effective installation of weatherization products and work specifications as well as meeting the operational

requirements found in all ODOC manuals and policy on the work they are contracted to do in support of their weatherization program.

To accomplish effective implementation of ODOC policy and procedures, Regional Subgrantees, along with the support and partnership of ODOC, must be proactive and diligent in engaging in organizational tracking of client file documents (i.e., job numbers), paperwork/data management, and regular progress reporting of data and narratives on unit/home production and other requirements.

This guidance will provide Oklahoma Regional Weatherization Subgrantees with the information needed to number client files and meet reporting requirements. OWPN 23-4 and DOE are sensitive to the client's confidentiality by establishing a coding system that is only accessible to staff in the weatherization program¹.

ODOC's reporting requirements needed updates due to ODOC's new DOE WAPBIL funding and the adjustment of the DHS LIHEAP program year. Please see [Attachments 37](#) and [38](#) for a complete checklist of all required reports for all three grant programs (DHSLIHEAP/DOEWAP/DOEBIL). Use this [link](#) to the federal regulations in regard to reporting that relates to Section 41 of the [ODOC Weatherization ODOC Weatherization Operations Manual](#).

1. Program Guidance

CLIENT FILE

- 1.1 The Subgrantee must maintain separate client files for each funding source contract (DHSLIHEAP/DOEWAP/DOEBIL)
- 1.2. The Subgrantee must update the job number for all client files (DOE and DHS) and must use a new format for BIL client files. The updated job number for DOE and DHS includes adding a single letter (either M or S) at the end of the job number representing either Mobile or Site Built. The new BIL job number format can be found in section 1.2.2 below.
 - 1.2.1 DOE or DHS Job Number
__ __ Funding Source (DOE or DHS), __ __ Program Year (last two digits of the year), __ __ First Letters of County, __ __ __ planned number of homes to be weatherized this program year (fill in blanks)

¹ [10 CFR 440.24 – Recording Keeping](#)

with leading zeros) _ **Type of Unit (Mobile=M, Site Built= S).**

1.2.2 BIL Job Number

__ _ Funding Source (BIL), __ _ Calendar Year (last two digits of the calendar year), __ _ First Letters of County, __ _ planned number of homes to be weatherized this program year (fill in blanks with leading zeros) _ Type of Unit (Mobile=M, Site Built= S).

EXAMPLES OF JOB NUMBERS:

- **BIL23OKL001S** [BIL 23 Funds, Oklahoma County, 1st home for all service area (not for a specific county) to be completed this PY, Site Built]
- **BIL24OKL150M** [BIL 24 Funds, Oklahoma County, 150th home for all service area (not for a specific county) to be completed this PY, Mobile Home]

REPORTING

- 1.3 WAP BIL home weatherization tracking counts and other data must be tracked separately from DOE WAP and DHS LIHEAP WX. Financial tracking for both DOE WAP, DOE BIL, and DHS LIHEAP WX must also be kept separate and audited separately.
- 1.4. WAP BIL weatherization program narratives must be submitted by the 10th of each month, whether homes have been completed or not. An explanation for any delays in productions must be adequately explained in the progress notes or the progress report will be rejected for changes. Early submission is encouraged. Reports shall be submitted to ODOC in an [OkGrants](#) form as listed in the program reporting requirement tables below.
- 1.5 WAPBIL quarterly reporting requirements are due at the same time periods as annual DOE WAP and DHS LIHEAP. LIHEAP quarterly reporting periods are now the same as DOE WAP. However, there will many more quarters in the WAPBIL contract (17 quarterly reporting periods). See Table 1 below for quarterly report due dates.

TABLE 1: QUARTERLY REPORTING PERIODS

Reporting Period	Quarterly Report Due Date
October – December	January 20 th
January – March	April 20 th
April – June	July 20 th
July – September	October 20 th

1.6 SHPO REPORT

SHPO reports are due for all three grants (WAPBIL, DOE WAP, DHS LIHEAP) on September 20 and May 31. To see current requirements, click on the [ODOC Weatherization Manual](#).

1.7 CLOSEOUT CERTIFICATION

Closeout reports are due no later than 60 days after the end of the contract period for all grants, including WAPBIL. DOE WAP annually requires a T/TA Final Report to be submitted along with closeout, while DHS LIHEAP WX requires an Outreach report to be submitted with closeout (if Outreach funds are spent). All due dates are listed below.

1.8 TABLE 2: REPORTING PERIODS

OK Department of Human Services LIHEAP Weatherization, DOE WAP, and DOE BIL Reporting Periods LIHEAP Contract Period: April 1 – March 31 WAP Contract Period: April 1 to March 31 BIL Contract Period: October 1, 2022 – December 2026			
Report Name	Due Date(s)	Frequency	Reporting Period
Progress Report	10th of every month	Monthly	Previous Month
OkGrants Quarterly Report *include reweatherization report if any homes were reweatherized	July 20 th October 20 th January 20 th April 20 th	+4 times during contract for Annual Grants +17 Times during contract for BIL	See Section II, Quarterly Reporting Periods

OK Department of Human Services LIHEAP Weatherization, DOE WAP, and DOE BIL Reporting Periods

LIHEAP Contract Period: April 1 – March 31

WAP Contract Period: April 1 to March 31

BIL Contract Period: October 1, 2022 – December 2026

Report Name	Due Date(s)	Frequency	Reporting Period
State Historic Preservation Report	September 20 th May 31 st	+Twice during the Contract Period for Annual Grants +Eight Times for BIL Over the Four Years.	Contract Period April – August September - March
LIHEAP Outreach Performance Report <i>[required only if Program Outreach funds were spent]</i>	May 31 st	Annually 60 calendars days from end of contract; submitted as an upload to the OKGrants Closeout Certification Page	DHS LIHEAP contract period of April 1 to March 31.
DOE WAP Annual T/TA Final Report	May 31 st	-Annually for DOE WAP, due on or before Closeout Not required for DHS LIHEAP or WAPBIL Submitted as an upload to the OKGrants Closeout Certification Page	DOE WAP contract period of April 1 to March 31
Closeout Certification	May 31 st for DHS LIHEAP and Annual DOE WAP; 60 days after the end of the	- Annually, 60 days after the end of the contract period for all grants.	DOE WAP and DHS LIHEAP contract period of April 1 to March 31 DOE BIL contract period of

	contract period for WAPBIL		Oct 1, 2022, to December 2026, although extensions into 2027 may be allowed.
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Table 2

CONCLUSION: The Oklahoma Regional Weatherization Assistance Programs continue to make progress in addressing BIL modifications to the existing policy and procedures such as client file documentation and ensuring Regional BIL Weatherization reporting is obtained in all the areas required and on a frequency level to ensure compliance and improvements where needed and in a timely manner.

Resources: [10 CFR 440.24 – Recording Keeping](#)
[10 CFR 440.25 – Reports](#)
[ODOC Weatherization ODOC Weatherization Operations Manual](#)
[Bipartisan Infrastructure Law Technical Assistance Guide](#)
[LIHEAP Guidance](#)
[Attachment 37](#)
[Attachment 38](#)